

No. 3:15-cr-00037-2
IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

BENJAMIN BRADLEY,

Defendant.

SUPPLEMENT TO MOTION TO MODIFY SENTENCE

Defendant Benjamin Bradley, through undersigned counsel, hereby submits this Supplement to provide the Court additional medical records in support of his motion to modify his sentence.

After submitting a FOIA request to the Bureau of Prisons, counsel received the attached records of a June 5, 2020, medical appointment. (*See Ex. A.*) The records substantiate that, on that date, Mr. Bradley's weight was 295 pounds, his BMI was 41.1, and his blood pressure was measured to be 178/100 and 184/106. The records also reflect diagnoses of essential (primary) hypertension and obesity, a prescription of 5 milligrams of amlodipine daily for blood pressure (to be increased gradually at his next appointment), and orders of laboratory tests, chest X-rays, and an EKG.

These records prove that Mr. Bradley has a CDC-recognized risk factor for severe complications from COVID-19: severe obesity, combined with stage 2 hypertension. Additionally,

the ordered tests imply that BOP doctors suspect Mr. Bradley may have additional underlying conditions that would exacerbate a COVID-19 infection.

Respectfully submitted,

/s/ Melissa M. Salinas
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CERTIFICATE OF SERVICE

I hereby certify that this Supplement was filed on June 8, 2020, using the Court's ECF system, which will send notice of this filing to all counsel of record indicated on the electronic receipt.

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